**IN THE UNITED STATES DISTRICT COURT
FOR THE NORTHERN DISTRICT OF ILLINOIS
EASTERN DIVISION**

HENRY ESPEJO, individually and on behalf of all others similarly situated,	Case No.: 1:11-cv-08987
Plaintiff,	Honorable Charles P. Kocoras
v.	Magistrate Judge Sidney I. Schenkier
SANTANDER CONSUMER USA, INC., an Illinois corporation,	
Defendant.	
———————————————————	
FAYE LEVINS, individually and on behalf of all others similarly situated,	Case No.: 1:12-cv-09431
Plaintiff,	Honorable Charles P. Kocoras
v.	Magistrate Judge Sidney I. Schenkier
SANTANDER CONSUMER USA, INC., an Illinois corporation,	
Defendant.	

**PLAINTIFF LEVINS'S UNOPPOSED MOTION FOR LEAVE TO FILE
MEMORANDUM OF LAW IN SUPPORT OF MOTION FOR
<u>CLASS CERTIFICATION WITH EXCESS PAGES *INSTANTER*</u>**

Pursuant to Local Rule 7.1, and without opposition from Defendant Santander Consumer

USA, Inc. ("Defendant"), Plaintiff Faye Levins ("Plaintiff"), individually and behalf of all others

similarly situated, hereby respectfully requests that this Court grant her leave to file her

Memorandum of Law in Support of Plaintiff Levins's Motion for Class Certification in excess of

the Court's fifteen-page limit, *instanter*. In support of the instant motion, Plaintiff states as

follows:

1.   On March 10, 2016, the Court set a briefing schedule requiring Plaintiff to file her

Motion for Class Certification by April 21, 2016. (Dkt. 89.)

1

2.   Plaintiff has now filed her Motion for Class Certification, (dkt. 100), and seeks to file a memorandum of law in support thereof, (the "Memorandum"), with excess pages.

3.   Plaintiff's proposed 32-page Memorandum is attached hereto as Exhibit A.[1] In accordance with Local Rule 7.1, a Table of Contents and Table of Authorities are also included in the Memorandum.

4.   Although Plaintiff endeavored to keep briefing as succinct as possible, excess pages were required to adequately address the factual and procedural background of this case, as well as the various requisites to class certification set forth in Federal Rule of Civil Procedure 23.

5.   Prior to filing the instant motion, Plaintiff's counsel conferred with counsel for Defendant, and is authorized to state that Defendant has no objection to the relief requested herein.

6.   Moreover, good cause exists to grant the instant motion, and the relief requested herein is not sought for any improper purpose.

WHEREFORE, Plaintiff Faye Levins respectfully requests that the Court enter an Order (i) granting her leave to file her 32-page Memorandum of Law in Support of Plaintiff Levins's Motion for Class Certification *instanter*, and (ii) providing such other and further relief as the Court deems reasonable and just.

Respectfully submitted,

FAYE LEVINS, individually and on behalf of all others similarly situated,

Dated: April 22, 2016   By: s/ J. Dominick Larry
                               One of Plaintiff's Attorneys

---

[1]   Contemporaneous with the filing of the instant motion, Plaintiff is also filing an Unopposed Motion for Leave to File Documents Under Seal. As described in that motion, Plaintiff seeks the Court's leave to file the Memorandum partially under seal, as it contains references to information deemed "Confidential" pursuant to the protective order entered in the related *Espejo* matter. (*See Espejo* dkt. 106.) Pursuant to the Court's Local Rules governing the submission of sealed filings, Plaintiff will also file an unredacted version of the proposed enlarged Memorandum provisionally under seal.

Jay Edelson
jedelson@edelson.com
Benjamin H. Richman
brichman@edelson.com
J. Dominick Larry
nlarry@edelson.com
EDELSON PC
350 North LaSalle Street, Suite 1300
Chicago, Illinois 60654
Tel: 312.589.6370
Fax: 312.589.6378

Rafey S. Balabanian
rbalabanian@edelson.com
EDELSON PC
329 Bryant Street, Suite 2C
San Francisco, California 94107
Tel: 415.234.5342
Fax: 415.373.9435

CERTIFICATE OF SERVICE

I hereby certify that on April 22, 2016, I served the above and foregoing by causing a true and accurate copy of such paper to be filed and transmitted to all counsel of record via the Court's CM/ECF electronic filing system.

s/ J. Dominick Larry